

SYNTHETIC MINOR OPERATING PERMIT

PERMITTEE: AMERICAN LEAKLESS COMPANY

FACILITY NAME:

LOCATION: ATHENS, ALABAMA

PERMIT NUMBER	DESCRIPTION OF EQUIPMENT, ARTICLE OR DEVICE
708-0030-X001	Coil Coating Operations with Associated Pollution Control Devices

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code §§22-22A-1 to 22-22A-15 (2006 Rplc. Vol. and 2007 Cum. Supp.), and rules and regulations adopted there under, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

ISSUANCE DATE:

**AMERICAN LEAKLESS COMPANY
ATHENS, ALABAMA
(PERMIT NO. 708-0030-X001)
PROVISOS**

1. This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.
2. This permit is not transferable. Upon sale or legal transfer, the new owner or operator must apply for a permit within 30 days.
3. A new permit application must be made for new sources, replacements, alterations or design changes which may result in the issuance of, or an increase in the issuance of, air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants.
4. Submittal of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require stack emission testing at any time.
5. Additions and revisions to the conditions of this Permit will be made, if necessary, to ensure that the Department's air pollution control rules and regulations are not violated.
6. Nothing in this permit or conditions thereto shall negate any authority granted to the Department pursuant to the Alabama Environmental Management Act or regulations issued there under.
7. This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.
8. Within 10 days of the end of each month, compliance with all provisos in this permit will be determined. These records shall be maintained for 2 years at the facility. Should this facility, at any time, exceed the limits in this permit, the Air Division must be notified in writing within ten (10) days of the identification of the exceedance.

9. Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stock piles, screens, dryers, hoppers, ductwork, etc.

Plant or haul roads and grounds will be maintained in the following manner so that dust will not become airborne:

- (A) by the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic;
 - (B) by reducing the speed of vehicular traffic to a point below that at which dust emissions are created;
 - (C) by paving;
 - (D) by the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or
 - (E) by any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.
10. This permit expires and the application is canceled if construction has not begun within 24 months of the date of issuance of the permit.
11. On completion of construction of the device for which this permit is issued, notification of the fact is to be given to the Chief of the Air Division. Authorization to operate the unit must be received from the Chief of the Air Division. Failure to notify the Chief of the Air Division of construction and/or operation without authorization could result in revocation of this permit.
12. Prior to a date to be specified by the Chief of the Air Division in the authorization to operate, emission tests are to be conducted by persons familiar with and using the EPA Sampling Train and Test Procedure as described in the Code of Federal Regulations, Title 40, Part 60, for the following pollutants: Written tests results are to be reported to the Department within 15 working days of completion of testing.

Particulates	()	Carbon Monoxide	()
Sulfur Dioxide	()	Nitrogen Oxides	()
Volatile Organic Compounds	(X)	Visible Emissions	()

13. Any performance tests required shall be conducted and data reduced in accordance with the test methods and procedures contained in each specific permit condition unless the Director (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology, (2) approves the use of an equivalent method, or (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance.
14. The Department must be notified in writing at least 30 working days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.

To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:

- (A) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.
- (B) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedure requires probe cleaning).
- (C) A description of the process(es) to be tested, including the feed rate, any operating parameter used to control or influence the operations, and the rated capacity.
- (D) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.

A pretest meeting may be held at the request of the source owner or the Department. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.

All test reports must be submitted to the Department within 15 days of the actual completion of the test, unless an extension of time is specifically approved by the Department.

15. Each point of emission will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.

16. In case of shutdown of air pollution control equipment for scheduled maintenance for a period greater than one (1) hour, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless accompanied by the immediate shutdown of the emission source.
17. In the event there is a breakdown of equipment in such a manner as to cause increased emission of air contaminants for a period greater than one (1) hour, unless accompanied by the immediate shutdown of the emission source, the person responsible for such equipment shall notify the Department within an additional 24 hours and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.
18. All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.
19. Records will be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the process equipment and any malfunction of the air pollution control equipment. These records will be kept in a permanent form suitable for inspection and will be retained for at least two years following the date of each occurrence. In the event there is a breakdown of air pollution control or process equipment in such a manner as to cause increased emission of air contaminants for a period greater than 30 minutes, the person responsible for such equipment shall notify the Department within 1 hour and provide a statement giving all pertinent facts, including the duration of the breakdown. The Department shall be notified when the breakdown has been corrected.
20. All the original data charts, performance evaluations, calibration checks, adjustment and maintenance records and other information regarding monitoring system(s) will be maintained in a permanent form suitable for inspection. The file shall be retained for at least two years following the date of such measurements, maintenance, reports and records.
21. The minimum operational temperature of the combustion chamber of the thermal oxidizer for the process equipment shall be determined by test. Following testing, the temperature corresponding to an acceptable VOC destruction efficiency shall be established as the minimum operation temperature of the combustion chamber. The temperature data must be instantaneously recorded on a chart or other permanent record form which shows continuous temperature readings of the combustion chamber temperature. The record must be maintained for at least two years following the data recording.

22. All thermal oxidizers or incinerators must have audible alarm or easily detectable signal which will provide a warning when the combustion chamber temperature decreases to less than the established minimum operational temperature. The origin and detectability of the audible or other signal shall be such that it can be readily heard or detected by the operator or another person who will immediately determine the cause and take appropriate action to correct any problem and/or record the malfunction/reason. The time, duration, cause(s), and the action(s) taken for any operating temperature less than the established minimum shall be recorded in a form suitable for inspection. These records shall be maintained for at least two years. For periods when the temperature is more than 50 °F below the minimum operating temperature, VOCs will be calculated as if there was no (0%) capture and destruction of VOCs in the thermal oxidizer.
23. This facility is subject to the applicable parts of New Source Performance Standards (NSPS) 40 CFR 60 subpart TT standards of Performance for Metal Coil Surface Coating. This facility shall not cause to be discharged into the atmosphere more than 1.0 pounds of VOCs per gallon of coating solids applied for each calendar month for any facility that continuously uses an emissions control device operated at the most recently demonstrated overall efficiency or 10 percent of the VOCs applied for each calendar month (90 percent emission reduction)
24. A written report for shall be submitted to the Air Division at least every three months. The report shall provide the following information, as applicable.
 - (A) The quantity of the solvents of VOCs in the coatings applied.
 - (B) The VOCs bypassed.
 - (C) The VOCs vented to the thermal oxidizer by the process operation.
 - (D) The estimated averaged destruction efficiency of the thermal oxidizer.
 - (E) The VOCs released or exhausted into the atmosphere by the thermal oxidizer.
 - (F) The time and date of any and all periods of coating operations where the temperature of the thermal oxidizer is more than 50 °F below minimum operational temperature.
 - (G) The cumulative or total quantity of VOCs released or exhausted into the atmosphere during the applicable month and previous eleven months.

25. Emission of Volatile Organic Compounds (VOCs) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 95 tons in any consecutive rolling 12-month period based on the premise that all VOCs applied are emitted to the atmosphere or are emitted to an emission control device with a VOC destruction efficiency. If the emissions of VOCs exceed this limit, the Air Division shall be notified in writing within 10 days of the exceedance. Accurate and understandable records of consumption, which records at least the last two years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to its air permit. These records shall contain the following information:

- (A) The type, quantity in gallons, and weight in lbs, of each VOC containing materials used each calendar month.
- (B) The VOC content by weight (in pounds per gallon) of each VOC containing materials used shall be determined using EPA Test Method 24, as defined in 40 CFR 60,

Appendix A, or equivalent vendor data approved by the Department in advance. The VOC content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.

- (C) The percent by volume and percent by weight of VOCs, solids, water, and exempt VOC compounds content of each VOC containing materials used each calendar month.
- (D) Complete inventories of VOC containing materials (their usage and VOC content) shall be made at the end of each calendar month. Compliance with VOC limits shall be based upon these monthly materials use inventories and the use and control efficiency of the RTO. Emissions may be adjusted for VOC content of material removed from the plant as waste or returns if the record-keeping and details surrounding the materials are approved in advance. Emissions calculations and records will also incorporate the use and control efficiency of the RTO.
- (E) The amount of VOCs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of VOCs emitted in the units of pounds and tons.

A report summarizing the above information shall be submitted for each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

26. Emission of Hazardous Air Pollutants (HAPs) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 24.5 tons in any consecutive rolling 12-month period based on the premise that all HAPs applied are emitted to the atmosphere or are emitted to an emission control device with a VOC destruction efficiency. Emission of a single Hazardous Air Pollutant (HAP) from all operations from the entire facility including, but not limited to coating, storage, cleanup, etc., shall not exceed 9.5 tons per pollutant in any consecutive rolling 12-month period based on the premise that all HAPs applied are emitted to the atmosphere or are emitted to an emission control device with a VOC destruction efficiency. If the emissions of HAPs exceed these limits, the Air Division shall be notified in writing within 10 days of the exceedance. Accurate and understandable records of consumption, which records at least the last two years of data, will be maintained in a permanent form suitable for inspection and be available immediately upon request. This facility shall provide a copy of records and supporting background documents upon request that pertain to its air permit. These records shall contain the following information:

- (A) The type, quantity in gallons, and weight in lbs, of each HAP containing materials used each calendar month.
- (B) The HAP content by weight (in pounds per gallon) of each coating used shall be determined using EPA Test Method 311, as defined in 40 CFR 63, Appendix A, or equivalent vendor data approved by the Department in advance. The HAP content of coatings may be determined by test method on a random basis to verify formulation data and such other times as the Department may request.
- (C) The percent by volume and percent by weight of HAP, solids, water, and content of each HAP containing materials used each calendar month.
- (D) Complete inventories of HAP containing materials (their usage and HAP content) shall be made at the end of each calendar month. Compliance with HAP limits shall be based upon these monthly materials use inventories and the use and control efficiency of the RTO. Emissions may be adjusted for HAP content of material removed from the plant as waste or returns if the record keeping and details surrounding the materials are approved in advance. Emissions calculations and records will also incorporate the use and control efficiency of the RTO.
- (E) The amount of HAPs emitted each calendar month expressed in the units of pounds and tons.
- (F) The rolling 12-month total of HAPs emitted in the units of pounds and tons.

A report summarizing the above information shall be submitted for each calendar quarter by the 15th day of the month following the end of the quarter, in a format approved by the Department in advance.

27. The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.
28. The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.

, 2011
Date